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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE LUIS REYNALDO REYES-CASTILLO,
a/k/a "Molesto,"

Defendant.

Case No. 2:19-cr-00103-JCM-VCF

**Stipulation to Continue Response to
Defendant's Motion to Dismiss (ECF
No. 137)**

The United States of America, by and through JASON M. FRIERSON, United States Attorney, and Melanee Smith and Jacob Operskalski, Assistant United States Attorneys; and DAVID L. JAFFE, Chief of the Violent Crime and Racketeering Section, U.S. Department of Justice, and Jeremy Franker and Christopher Taylor, Trial Attorneys; and defendant Jose

1 Luis Reynaldo Reyes-Castillo, by and through his counsel, Richard A. Wright, Monti J.
2 Levy, and John P. Balazs, hereby stipulate and agree to continue the June 3, 2024 deadline
3 for the government to file a response to defendant's Motion to Dismiss (ECF No. 137) to July
4 15, 2024.

5 The parties enter this stipulation for the following reasons:

6 1. The defendant's motion argues the grand jury that returned the superseding
7 indictment was not constitutionally sound. The superseding indictment was filed in August
8 2021. (ECF No. 69)

9 2. The government expects to present additional evidence to the current grand
10 jury the last week of June and will ask them to return a second superseding indictment. The
11 current grand jury was empaneled in August 2022.

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3. If the current grand jury returns a second superseding indictment, the defendant's motion will be moot. The current grand jury is composed of different jurors than the grand jury that returned the first superseding indictment.

4. The defense does not object to the continuance.

Respectfully submitted this 31st day of May 2024.

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United States Attorney

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/s/ Jacob Operskalski
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/s/ Jeremy Franker
/s/ Christopher Taylor
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JOHN BALAZS, ESQ.
Counsel for defendant
JOSE LUIS REYES-CASTILLO

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

Case No. 2:19-cr-00103-GMN-MDC

4 Plaintiff,

5 v.

6 JOSE LUIS REYNALDO REYES-CASTILLO,
a/k/a "Molesto,"

7
8 ORDER

9 Based on the stipulation of counsel, the Court finds that good cause exists to modify
10 the June 3, 2024 deadline for the government to file its response to defendant Jose Luis
11 Reynaldo Reyes-Castillo's Motion to Dismiss (ECF No. 137).

12 IT IS THEREFORE ORDERED that the government's deadline to file a response to
13 defendant Jose Luis Reynaldo Reyes-Castillo's Motion to Dismiss shall be extended from
14 June 3, 2024, to July 15, 2024.

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16 DATED: This 4th day of June, 2024.

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19 United States Magistrate Judge
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